

Response under 37 C.F.R. 1.116

Applicant: Thane M. Larson et al.

Serial No.: 09/924,029

Filed: August 7, 2001

Docket No.: 10012573-1

Title: SYSTEM AND METHOD FOR PROVIDING NETWORK ADDRESS INFORMATION IN A SERVER SYSTEM

REMARKS

This is responsive to the Final Office Action mailed August 12, 2005. In that Office Action, the Examiner repeated the rejections outlined in the Non-Final Office Action mailed February 10, 2005, wherein claims 1-7, 9-13, and 15-19 were rejected under 35 U.S.C. §103(a) as being unpatentable over "the admitted prior art", and further in view of Verthein et al., U.S. Patent No. 6,678,284 ("Verthein"). Claims 8, 14, and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over "the admitted prior art," and further in view of Verthein and Liu, U.S. Patent No. 6,185,110 ("Liu").

With this Response, Applicant respectfully traverses the Examiner's rejection of claims 1-20, and requests reconsideration of these claims. Claims 1-20 remain pending in the application and are presented for reconsideration and allowance.

35 U.S.C. §103 Rejections

The Examiner rejected claims 1-7, 9-13, and 15-19 under 35 U.S.C. §103(a) as being unpatentable over "the admitted prior art", and further in view of Verthein et al., U.S. Patent No. 6,678,284 ("Verthein"). In the Office Action mailed February 10, 2005, the Examiner stated the following regarding claim 1:

As per claim 1, a server system with plurality of host processing cards and manual assignment of IP addresses to the host processing cards are admitted prior art (Applicant's specification page 1). The admitted prior art does not have a management card with user interface for manual assignment of the IP addresses. In similar field of invention, Verthein teaches providing a general purpose computing card in the server chassis coupled to plurality of network service cards via the internal chassis bus. The general purpose computing card is installed with management software. This provides for improve network management and reduces access and processing time. (See Verthein col.2 lines 55-62, col. 3 lines 5-8). Hence, given the teaching of Verthein, one of ordinary skill in the art would have been motivated at the time of the invention to have a management card in the chassis of the prior art server system for managing the host processor cards in the chassis because it would have eliminated (sic) the need for connecting an external terminal to the chassis and improved management and reduced access time to the host processing cards in the chassis. (Office Action mailed February 10, 2005 at pages 2-3).

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Independent claim 1 recites "the management card including at least one user interface for receiving network address information from a user". Applicant did not admit that this limitation is prior art. As the Examiner pointed out, Verthein discloses a general purpose computing card 24. However, there is no teaching or suggestion in Verthein that the computing card 24 (or any other card disclosed therein) includes at least one user interface for receiving network address information from a user.

Independent claim 1 also recites "the management card configured to send received network address information to the plurality of host processor cards via the at least one bus, thereby configuring the host processor cards for management LAN communications." Applicant did not admit that this limitation is prior art. There is no teaching or suggestion in Verthein that the computing card 24 (or any other card disclosed therein) is configured to send received network address information to a plurality of host processor cards via a bus, thereby configuring the host processor cards for management LAN communications. Thus, the cited prior art, either alone, or in combination, does not teach or suggest each and every limitation of independent claim 1.

One of the requirements of establishing a *prima facie* case of obviousness is that "the prior art reference (or references when combined) must teach or suggest all the claim limitations." MPEP § 2143. Even if the computing card 24 disclosed in Verthein were incorporated into a server system with a plurality of host processor cards, which the Examiner appeared to propose despite no suggestion in the cited prior art to make such a combination, this combination does not teach or suggest all of the claim limitations. The cited prior art does not teach or suggest that the computing card 24 could or should be configured to receive network address information from a user. The cited prior art also does not teach or suggest that the computing card 24 could or should send received network address information to a plurality of host processor cards via a bus, and thereby configure the host processor cards for management LAN communications. Applicant respectfully submits that a *prima facie* case of obviousness of claim 1 has not been established. Simply pointing out that the computing card 24 is "installed with management software" does not establish a *prima facie* case of obviousness, as this does not teach or suggest the claim limitations addressed above.

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In view of the above, independent claim 1 is not taught or suggested by the cited prior art, either alone, or in combination. Applicant respectfully traverses the rejection of claim 1, and reconsideration and allowance of claim 1 is respectfully requested. Dependent claims 2-7 further limit patentably distinct claim 1, and are believed to be allowable over the cited prior art. Dependent claims 2-7 are also further distinguishable over the cited prior art. For example, dependent claim 2 recites "the server system of claim 1, wherein the at least one bus is an I²C bus." The Examiner acknowledged that the cited prior art does not teach or suggest this limitation. (Office Action mailed February 10, 2005, at page 3). Since dependent claim 2 is not taught or suggested by the cited prior art, claim 2 is believed to be allowable over the cited prior art.

Dependent claim 3 recites "the server system of claim 2, wherein the at least one bus is an intelligent platform management interface (IPMI) I²C bus." The Examiner acknowledged that the cited prior art does not teach or suggest this limitation. (Office Action mailed February 10, 2005, at page 3). Since dependent claim 3 is not taught or suggested by the cited prior art, claim 3 is believed to be allowable over the cited prior art.

Dependent claim 4 recites "the server system of claim 3, wherein the network address information sent from the management card to the plurality of host processor cards is sent using an augmented IPMI protocol that includes additional host processor card configuration commands." Regarding dependent claim 4, the Examiner stated that "since the management card is for managing the host processing cards in the chassis. It would have been obvious to use the management card to send other configuration data beside the IP addresses to the host processing cards." (Office Action mailed February 10, 2005, at pages 3-4). There is no teaching or suggestion in Verthein that the computing card 24 "is for managing the host processing cards in the chassis". The Examiner has not identified any disclosure in Verthein that teaches or suggests sending IP addresses "or other configuration data" from the computing card 24. The Examiner has not identified any prior art that teaches or suggests the limitations of claim 4. Since dependent claim 4 is not taught or suggested by the cited prior art, claim 4 is believed to be allowable over the cited prior art.

Dependent claim 5 recites "the server system of claim 1, wherein the network address information includes internet protocol (IP) address information." With respect to claim 5, the Examiner stated that "manual assignment of IP address to the host processing card is in the

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admitted prior (see Applicant's specification page 1)." (Office Action mailed February 10, 2005, at page 5). The "admitted prior art" does not teach or suggest a management card configured to send received network address information to a plurality of host processor cards via at least one bus. The "admitted prior art" does not teach or suggest a management card configured to send received internet protocol (IP) address information to a plurality of host processor cards via at least one bus. The Examiner has not identified any prior art that teaches or suggests the limitations of claim 5. Since dependent claim 5 is not taught or suggested by the cited prior art, claim 5 is believed to be allowable over the cited prior art.

Dependent claim 6 recites "the server system of claim 5, wherein the IP address information includes an IP address, gateway address, subnet address, and host name." The Examiner has not identified any prior art that teaches or suggests the limitations of claim 6. Since dependent claim 6 is not taught or suggested by the cited prior art, claim 6 is believed to be allowable over the cited prior art.

In view of the above, dependent claims 2-7 are believed to be allowable over the cited prior art, and reconsideration and allowance of claims 2-7 is respectfully requested.

Independent claim 9 recites "a controller configured to output entered network address information to the plurality of host processor cards via the at least one I²C bus connection, thereby configuring the plurality of host processor cards for network communications." With respect to claim 9, the Examiner stated that "[a]s per claims 9-13, they are rejected under similar rationale as for claims 1-6 above." (Office Action mailed February 10, 2005 at page 4). For the reasons set forth above with respect to claim 1, independent claim 9 is also not taught or suggested by the cited prior art, either alone, or in combination. Applicant respectfully traverses the rejection of claim 9, and reconsideration and allowance of claim 9 is respectfully requested. Dependent claims 10-13 further limit patentably distinct claim 9, and are believed to be allowable over the cited prior art. In addition, claims 10-13 are further distinguishable over the cited prior art, and are believed to be allowable for the reasons set forth above with respect to dependent claims 2-7. Reconsideration and allowance of claims 10-13 is respectfully requested.

Independent claim 15 recites "sending entered network address information from the management card to the host processor cards, thereby configuring the host processor cards for management network communications." With respect to claim 15, the Examiner stated that

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"[a]s per claims 15-19, they are method corresponding the (sic) the system claims 1-6. Hence, they are rejected under similar rationale as claims 1-6 above." (Office Action mailed February 10, 2005 at page 4). For the reasons set forth above with respect to claim 1, independent claim 15 is also not taught or suggested by the cited prior art, either alone, or in combination. Applicant respectfully traverses the rejection of claim 15, and reconsideration and allowance of claim 15 is respectfully requested. Dependent claims 16-19 further limit patentably distinct claim 15, and are believed to be allowable over the cited prior art. In addition, claims 16-19 are further distinguishable over the cited prior art, and are believed to be allowable for the reasons set forth above with respect to dependent claims 2-7. Reconsideration and allowance of claims 16-19 is respectfully requested.

The Examiner rejected claims 8, 14, and 20 under 35 U.S.C. §103(a) as being unpatentable over "the admitted prior art," and further in view of Verthein and Liu, U.S. Patent No. 6,185,110 ("Liu"). Dependent claims 8, 14, and 20 further limit patentably distinct claims 1, 9, and 15, respectively. The cited prior art does not teach or suggest the limitations of these independent claims addressed above. Claims 8, 14, and 20 are also further distinguishable over the cited prior art, and are believed to be allowable over the cited prior art. Reconsideration and allowance of claims 8, 14, and 20 is respectfully requested.

Reply to Examiner's Response to Arguments

In the Final Office Action, the Examiner gave the following response to Applicant's previously submitted arguments:

Applicant argued that there is no teaching or suggestion in Verthein that the computing card 24 is configured to send received network address information to a plurality of host processor cards via a bus. The argument is not persuasive. As admitted by Applicant in the background disclosure, it is known in the art to manually assign IP to host processing cards. This is a conventional configuration procedure. The admitted prior art system uses RS-323 (sic) interface as the interface to configure these host processing cards. Verthein teaches an improved method for network management by providing a computing card in direct communication with the internal chassis bus for carrying out management function [see col. 2, lines 55-60.] Hence, it is clear from Verthein teaching that configuration information is transmitted to cards in the chassis via the internal chassis bus (see col. 3 lines 1-7 and 9-14). Given the teaching of Verthein, it clearly would have been obvious to use Verthein computing card to manage a chassis containing host

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processing cards such as that of the admitted prior art system. Since part of the management of the host processing cards is the manual assignment of IP addresses, it is apparent that IP addresses assignment input by the administrator would be transmitted from the Verthein computing card to the processing cards via the chassis internal bus. (Final Office Action at pages 2-3) (emphasis added).

The Examiner made several statements (highlighted above) that are not supported by any disclosure in the cited prior art. Each of these statements is addressed below.

The Examiner stated that "it is clear from Verthein teaching that configuration information is transmitted to cards in the chassis via the internal chassis bus", and in support of this statement, the Examiner cited Verthein at col. 3, lines 1-7 and 9-14. Verthein at col. 3, lines 1-7 and 9-14 discloses the following:

...computing platform to run network server programs on the operating system locally, i.e., in the communication chassis, computing functionality that has been provided only by remote computers on a local area network in the prior art is incorporated into the communications chassis itself, providing for improved network management, increased network security and reduced access and processing time, all in a

In a preferred form, the chassis comprises a plurality of slots receiving cards incorporating therein the telephone interface, network interface and the signal conversion system, and wherein the communications chassis further comprises at least one card, insertable into said one of the slots, having incorporated therein the general purpose computing platform.

Contrary to the Examiner's statement, there is nothing in these portions of Verthein regarding transmitting configuration information to cards in the chassis via the internal chassis bus. These cited portions of Verthein do not even mention configuration information.

In the above response to arguments, the Examiner also cited Verthein at col. 2, lines 55-60, which discloses the following:

A general purpose computing platform is installed in the communications chassis. The general purpose computing platform further comprises an interface providing direct communication access between the general purpose computing platform and the internal chassis bus, allowing access and control by the computing platform of the signal conversion system, the telephone interface, and/or the network interface.

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There is also nothing in this cited portion of Verthein to support the Examiner's statement that "configuration information is transmitted to cards in the chassis via the internal chassis bus". This cited portion of Verthein also does not even mention configuration information.

Even if Verthein did teach transmitting configuration information to cards in the chassis via the internal chassis bus, which the Examiner has stated without identifying any supporting disclosure, this still does not teach or suggest the limitations of the independent claims addressed above. The independent claims do not simply recite transmitting "configuration information". Rather, claim 1, for example, recites "the management card configured to send received network address information to the plurality of host processor cards via the at least one bus, thereby configuring the host processor cards for management LAN communications." Applicant did not admit that this limitation is prior art, and there is no teaching or suggestion in Verthein that the computing card 24 (or any other card disclosed therein) could or should be configured to send received network address information to a plurality of host processor cards via a bus, thereby configuring the host processor cards for management LAN communications.

The Examiner also stated that "[g]iven the teaching of Verthein, it clearly would have been obvious to use Verthein computing card to manage a chassis containing host processing cards such as that of the admitted prior art system." It is unclear what teaching in Verthein the Examiner is relying on to support this statement. The portions of Verthein addressed above provide no such support. The Examiner has identified no teaching or suggestion in Verthein that the general purpose computing card 24 could or should be configured to manage a plurality of host processor cards in a server system.

The Examiner further stated that "[s]ince part of the management of the host processing cards is the manual assignment of IP addresses, it is apparent that IP addresses assignment input by the administrator would be transmitted from the Verthein computing card to the processing cards via the chassis internal bus." Again, there is nothing in the cited prior art to support this statement. Since no prior art citation has been provided to support this statement, it is unclear to Applicant why it is "apparent" to the Examiner that IP address assignments input by an administrator would be transmitted from the Verthein computing card to processing cards via a chassis internal bus. The "admitted prior art" does not teach or

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suggest this. Rather, as Applicant pointed out in the Background of the Invention section of the present Application, most solutions in the marketplace use a separate RS232 serial port connection to every host processor card. The "admitted prior art" does not teach or suggest that IP address assignments input by an administrator would be transmitted from a computing card to processing cards via a chassis internal bus. Likewise, the Examiner has identified no disclosure in Verthein that teaches or suggests that IP address assignments input by an administrator would be transmitted from a computing card to processing cards via a chassis internal bus.

Applicant respectfully submits that reliance on such unsupported statements and speculation does not establish a *prima facie* case of obviousness. Since the cited prior art does not teach or suggest the limitations addressed above, Applicant respectfully requests allowance of claims 1-20, or requests in accordance with M.P.E.P. § 2144.03 that the Examiner cite a reference that teaches these limitations.

CONCLUSION

In view of the above, Applicant respectfully submits that pending claims 1-20 are in form for allowance and are not taught or suggested by the cited references. Therefore, reconsideration and withdrawal of the rejections and allowance of claims 1-20 is respectfully requested.

No fees are required under 37 C.F.R. 1.16(h)(i). However, if such fees are required, the Patent Office is hereby authorized to charge Deposit Account No. 08-2025.

The Examiner is invited to contact the Applicant's representative at the below-listed telephone numbers to facilitate prosecution of this application.

Any inquiry regarding this Amendment and Response should be directed to either David A. Plettner at Telephone No. (408) 447-3013, Facsimile No. (408) 447-0854 or Jeff A. Holmen at Telephone No. (612) 573-0178, Facsimile No. (612) 573-2005. In addition, all correspondence should continue to be directed to the following address:

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Respectfully submitted,

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CERTIFICATE UNDER 37 C.F.R. 1.8:

The undersigned hereby certifies that this paper or papers, as described herein, are being transmitted via telefacsimile to
Examiner Dung C. Dinh, Group Art Unit 2152, at Fax No. (571) 273-8300 on this 10th day of October, 2005.

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